

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

(1) CORDELL A. WASHINGTON,
aka "Corey"
aka "Dub"
aka "Bro"
(Cts. 1, 3, 7, 8, 9, 10, 11, 12)

(2) PATRICK M. SAULTZ,
aka "White Boy Pat"
(Cts. 1, 6, 7, 8, 9, 10, 11, 12)

(3) DAVID E. PRICE,
aka "DP"
(Cts. 1, 4, 5)

(4) ALLISON E. SMITH,
aka "Alli"
(Ct. 1, 13)

(5) TAVARYYUAN JOHNSON,
aka "Gucci"
aka "TJ"
(Cts. 1, 2)

(6) TYLER N. BOURDO,
(Cts. 1, 6)

(7) ALEXIS C. LEWIS,
(Cts. 1, 12)

(8) MICHAEL FOWLER,
(Cts. 1, 10)

(9) CARMELA BROOKS,
(Ct. 1)

CASE NO.

JUDGE

INDICTMENT

18 U.S.C. § 924(c)
21 U.S.C. § 841(a)(1)
21 U.S.C. § 841(b)(1)(A)
21 U.S.C. § 846
21 U.S.C. § 860

FORFEITURE

18 U.S.C. § 924(d)(1)
21 U.S.C. § 853(a)(1) and (2)
28 U.S.C. § 2461(c)

FILED
RICHARD W. MAGEL
CLERK OF COURT

2022 JUN 30 PM 12:52

U.S. DISTRICT COURT
SOUTHERN DIST. OHIO
EAST. DIV. COLUMBUS

(10) DUSTIN A. SPEAKMAN, and
aka "Dawg"
(Ct. 11)

(11) DANNY G. MULLINS,
(Ct. 13)
Defendants.

THE GRAND JURY CHARGES:

COUNT 1

**(Conspiracy to Distribute and Possess with Intent to Distribute Fentanyl,
Cocaine, and Cocaine Base)**

Between on or about September 1, 2020, through and including June 29, 2022, in the Southern District of Ohio and elsewhere, the defendants, **CORDELL A. WASHINGTON, aka "Corey", aka "Dub", aka "Bro", PATRICK M. SAULTZ, aka "White Boy Pat", DAVID E. PRICE, aka "DP", ALLISON E. SMITH, aka "Alli", TAVARYYUAN JOHNSON, aka "Gucci", aka "TJ", TYLER N. BOURDO, ALEXIS C. LEWIS, MICHAEL FOWLER, CARMELA BROOKS**, did knowingly, intentionally, and unlawfully conspire with others, both known and unknown to the Grand Jury, to distribute and possess with intent to distribute 400 grams or more of a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide, commonly referred to as "fentanyl", 5 kilograms or more of a mixture or substance containing a detectable amount of cocaine, and 280 grams or more of a mixture or substance containing a detectable amount of cocaine base, commonly referred to as "crack", Schedule II controlled substances, in violation of 21 U.S.C. §§ 841(a)(1), 841(b)(1)(A)(vi), 841(b)(1)(A)(ii), 841(b)(1)(A)(iii), and 846.

It was a part of the conspiracy that **CORDELL A. WASHINGTON, aka "Corey", aka "Dub", aka "Bro", and PATRICK M. SAULTZ, aka "White Boy Pat"**, were the leaders of a

Drug Trafficking organization (DTO) that received illegal controlled substances including but not limited to fentanyl, cocaine, and cocaine base, and sold it to drug users in and around the central Ohio area.

It was further a part of the conspiracy that coconspirators in this DTO utilized mobile phones and other communication devices and applications to discuss the delivery, storage, preparation, packaging, distribution, sale, and proceeds from the business of trafficking in illegal controlled substances.

It was further a part of the conspiracy that the coconspirators utilized code words when discussing the importation, storage, preparation, packaging, distribution, sale, and proceeds from the business of trafficking in illegal controlled substances.

It was further a part of the conspiracy that the coconspirators would utilize residences for the sale of illegal controlled substances to users who arrived at the residences to purchase controlled substances.

It was further a part of the conspiracy that the coconspirators utilized residences to store and sell illegal drugs that are within 1,000 feet of the real property of a Columbus, Ohio elementary school, that is Burroughs Elementary; specifically, these residences were located at 559 S. Burgess Avenue, Columbus, Ohio and 505 S. Harris Avenue, Columbus, Ohio.

It was further a part of the conspiracy that many of the drug users called a cell phone to inquire about visiting the residences used by the DTO in order to purchase illegal controlled substances.

It was further a part of the conspiracy that one member of the organization acted as a manager or seller at the residence being used for sales by answering the cell phone and selling

illegal controlled substances to users who arrived to purchase illegal drugs, while others in the organization distanced themselves from the day to day sales.

It was further a part of the conspiracy that a coconspirator would purchase houses and storage facilities to use as stash houses to store the illegal controlled substances.

It was further a part of the conspiracy that the cocconspirators would solicit persons to trade U.S. currency and / or illegal drugs for checks and money orders in order to deposit into accounts controlled by the coconspirators in an attempt to launder their drug proceeds.

It was further a part of the conspiracy that the coconspirators would create Limited Liability Companies in order to create bank accounts to deposit their drug proceeds.

It was further a part of the conspiracy that this DTO supplied distribution amounts of illegal controlled substances, including but not limited to fentanyl, to other drug distributors.

In violation of 21 U.S.C. §§ 841(a)(1), 841(b)(1)(A), 846, and 860.

COUNT 2
(Possession with Intent to Distribute Heroin and Cocaine Base)

On or about September 4, 2020, in the Southern District of Ohio, the defendant, TAVARYYUAN JOHNSON, aka “Gucci”, aka “TJ”, did knowingly, intentionally, and unlawfully possess with intent to distribute 100 grams or more of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, and 280 grams or more of a mixture or substance containing a detectable amount of cocaine base, commonly referred to as “crack”, a Schedule II controlled substance.

In violation of 21 U.S.C. §§ 841(a)(1), 841(b)(1)(B)(i) and 841(b)(1)(A)(iii).

COUNT 3

**(Conspiracy to Distribute and Possess with Intent to Distribute Cocaine Base,
Cocaine, Fentanyl, Heroin, and Marijuana)**

On or about December 17, 2020, in the Southern District of Ohio, the defendant, **CORDELL A. WASHINGTON, aka “Corey”, aka “Dub”, aka “Bro”**, and others, both known and unknown to the Grand Jury, did knowingly, intentionally, and unlawfully conspire with others, both known and unknown to the Grand Jury, to distribute and possess with intent to distribute 28 grams or more of a mixture or substance containing a detectable amount of cocaine base, commonly referred to as “crack”, a mixture and substance containing a detectable amount of cocaine, and a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidnyl] propanamide, commonly referred to as “fentanyl”, Schedule II controlled substances, and a mixture or substance containing a detectable amount of heroin and marijuana, Schedule I controlled substances.

In violation of 21 U.S.C. §§ 841(a)(1), 841(b)(1)(A), 841(b)(1)(C), and 846.

COUNT 4

**(Conspiracy to Distribute and Possess with Intent to Distribute
Cocaine and Fentanyl)**

On or about August 4, 2021, in the Southern District of Ohio, the defendant, **DAVID E. PRICE, aka “DP”**, and others, both known and unknown to the Grand Jury, did knowingly, intentionally, and unlawfully conspire with others, both known and unknown to the Grand Jury, to distribute and possess with intent to distribute a mixture or substance containing a detectable amount of cocaine, and a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidnyl] propanamide, commonly referred to as “fentanyl”, Schedule II controlled substances.

In violation of 21 U.S.C. §§ 841(a)(1), 841(b)(1)(C), and 846.

COUNT 5

(Possession of a Firearm in Furtherance of a Drug Trafficking Crime)

On or about August 4, 2021, in the Southern District of Ohio, the defendant, **DAVID E. PRICE, aka “DP”**, did knowingly possess a firearm or firearms, that is: a Jennings 9, 9 mm handgun, SN: 1509754; a Ruger SR22P, .22 caliber handgun, SN: 36374908; and a Jimenez Arms, Model JA380, .380 caliber handgun, SN: 091278, in furtherance of a drug trafficking crime, that is, possession with intent to distribute and / or conspiracy to distribute and possess with intent to distribute cocaine and fentanyl, in violation of 21 U.S.C. §§ 841(a)(1) and 846.

In violation of 18 U.S.C. § 924(c)(1)(A)(i).

COUNT 6

(Conspiracy to Distribute and Possess with Intent to Distribute Fentanyl)

On or about September 5, 2021, through and including September 16, 2021, in the Southern District of Ohio, the defendants, **PATRICK M. SAULTZ, aka “White Boy Pat” and TYLER BOURDO**, and others, both known and unknown to the Grand Jury, did knowingly, intentionally, and unlawfully conspire with others, both known and unknown to the Grand Jury, to distribute and possess with intent to distribute 40 grams or more of a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidnyl] propanamide, commonly referred to as “fentanyl”, a Schedule II controlled substance.

In violation of 21 U.S.C. §§ 841(a)(1), 841(b)(1)(B)(vi), and 846.

COUNT 7

(Conspiracy to Distribute and Possess with Intent to Distribute Fentanyl)

On or about June 22, 2022, in the Southern District of Ohio, and elsewhere, the defendants, **CORDELL A. WASHINGTON, aka “Corey”, aka “Dub”, aka “Bro”, and PATRICK M. SAULTZ, aka “White Boy Pat”**, did knowingly, intentionally, and unlawfully conspire with others, both known and unknown to the Grand Jury, to distribute and possess with intent to distribute 40 grams or more of a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidnyl] propanamide, commonly referred to as “fentanyl”, a Schedule II controlled substance.

In violation of 21 U.S.C. §§ 841(a)(1), 841(b)(1)(B)(vi), and 846.

COUNT 8

(Conspiracy to Distribute and Possess with Intent to Distribute Fentanyl)

On or about June 23, 2022, in the Southern District of Ohio, and elsewhere, the defendants, **CORDELL A. WASHINGTON, aka “Corey”, aka “Dub”, aka “Bro”, and PATRICK M. SAULTZ, aka “White Boy Pat”**, did knowingly, intentionally, and unlawfully conspire with others, both known and unknown to the Grand Jury, to distribute and possess with intent to distribute 40 grams or more of a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidnyl] propanamide, commonly referred to as “fentanyl”, a Schedule II controlled substance, and did so within 1,000 feet of the real property of a Columbus Public School, to wit, Burroughs Elementary.

In violation of 21 U.S.C. §§ 841(a)(1), 841(b)(1)(B)(vi), 846, and 860.

COUNT 9

(Conspiracy to Distribute and Possess with Intent to Distribute Fentanyl)

On or about June 23, 2022, in the Southern District of Ohio, and elsewhere, the defendants, **CORDELL A. WASHINGTON, aka “Corey”, aka “Dub”, aka “Bro”**, **PATRICK M. SAULTZ, aka “White Boy Pat”, MICHAEL FOWLER, and CARMELA BROOKS**, did knowingly, intentionally, and unlawfully conspire with others, both known and unknown to the Grand Jury, to distribute and possess with intent to distribute 40 grams or more of a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide, commonly referred to as “fentanyl”, a Schedule II controlled substance, and did so within 1,000 feet of the real property of a Columbus Public School, to wit, Burroughs Elementary.

In violation of 21 U.S.C. §§ 841(a)(1), 841(b)(1)(B)(vi), 846, and 860.

COUNT 10

(Conspiracy to Distribute and Possess with Intent to Distribute Cocaine Base)

On or about June 25, 2022, in the Southern District of Ohio, and elsewhere, the defendants, **CORDELL A. WASHINGTON, aka “Corey”, aka “Dub”, aka “Bro”**, **PATRICK M. SAULTZ, aka “White Boy Pat”, and DUSTIN A. SPEAKMAN, aka “Dawg”**, did knowingly, intentionally, and unlawfully conspire with others, both known and unknown to the Grand Jury, to possess with intent to distribute a mixture or substance containing a detectable amount of cocaine base, commonly referred to as “crack”, a Schedule II controlled substance.

In violation of 21 U.S.C. §§ 841(a)(1), 841(b)(1)(C), and 846.

COUNT 11

(Conspiracy to Distribute and Possess with Intent to Distribute Fentanyl)

On or about June 26, 2022, in the Southern District of Ohio, and elsewhere, the defendants, **CORDELL A. WASHINGTON, aka “Corey”, aka “Dub”, aka “Bro”**, **PATRICK M. SAULTZ, aka “White Boy Pat”, and ALEXIS C. LEWIS**, did knowingly, intentionally, and unlawfully conspire with others, both known and unknown to the Grand Jury, to distribute and possess with intent to distribute 40 grams or more of a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide, commonly referred to as “fentanyl”, a Schedule II controlled substance, and did so within 1,000 feet of the real property of a Columbus Public School, to wit, Burroughs Elementary.

In violation of 21 U.S.C. §§ 841(a)(1), 841(b)(1)(B)(vi), 846, and 860.

COUNT 12

(Possession with Intent to Distribute Fentanyl)

On or about June 29, 2022, in the Southern District of Ohio, the defendant, **DANNY G. MULLINS AND ALLISON E. SMITH**, did knowingly, intentionally, and unlawfully possess with intent to distribute a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide, commonly referred to as “fentanyl”, a Schedule II controlled substance.

In violation of 21 U.S.C. §§ 841(a)(1), 841(b)(1)(C) and 18 U.S.C. § 2.

FORFEITURE A

1. The allegations of this Indictment are realleged and by this reference fully incorporated herein for the purpose of alleging forfeitures to the United States of America pursuant to the provisions of 21 U.S.C. § 853(a)(1) and (2).

2. Upon conviction of any offense in violation of 21 U.S.C. § 841 and/or 21 U.S.C. § 846 as alleged in this Indictment, the defendants, **CORDELL A. WASHINGTON, aka "Corey", aka "Dub", aka "Bro", PATRICK M. SAULTZ, aka "White Boy Pat", DAVID E. PRICE, aka "DP", ALLISON E. SMITH, aka "Alli", TAVARYYUAN JOHNSON, aka "Gucci", aka "TJ", TYLER N. BOURDO, ALEXIS C. LEWIS, MICHAEL FOWLER, CARMELA BROOKS, DUSTIN A. SPEAKMAN, aka "Dawg", and DANNY G. MULLINS**, shall forfeit to the United States all right, title and interest in any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of such violations of 21 U.S.C. § 841 and/or 21 U.S.C. § 846, and/or any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of such violations.

3. Substitute Assets: If any of the forfeitable property described above, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

it is the intent of the United States of America, pursuant to 21 U.S.C. § 853(p), to seek forfeiture of any other property of the defendants up to the value of the above forfeitable property.

Forfeiture pursuant to 21 U.S.C. § 853(a)(1) and (2) and Rule 32.2 of the Federal Rules of Criminal Procedure.

FORFEITURE B

1. The allegations of this Indictment are realleged and by this reference fully incorporated herein for the purpose of alleging forfeitures to the United States of America pursuant to 18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c).

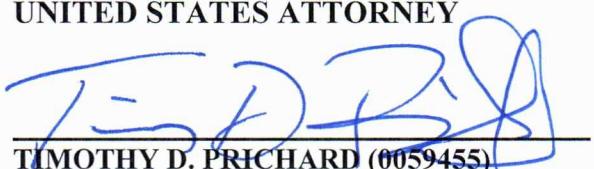
2. Upon conviction of one or more of the offenses alleged in this Indictment, the defendants, **CORDELL A. WASHINGTON, aka “Corey”, aka “Dub”, aka “Bro”, PATRICK M. SAULTZ, aka “White Boy Pat”, DAVID E. PRICE, aka “DP”, ALLISON E. SMITH, aka “Alli”, TAVARYYUAN JOHNSON, aka “Gucci”, aka “TJ”, TYLER N. BOURDO, ALEXIS C. LEWIS, MICHAEL FOWLER, CARMELA BROOKS, DUSTIN A. SPEAKMAN, aka “Dawg”, and DANNY G. MULLINS**, shall forfeit to the United States all firearms and ammunition involved in or used in such offense.

Forfeiture pursuant to 18 U.S.C. § 924(d)(1), 28 U.S.C. § 2461(c), and Rule 32.2 of the Federal Rules of Criminal Procedure.

A TRUE BILL

s/Foreperson
FOREPERSON

**KENNETH L. PARKER
UNITED STATES ATTORNEY**


TIMOTHY D. PRICHARD (0059455)

Assistant United States Attorney